

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

U.S. DISTRICT COURT

2011 OCT 19 P 3:53

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MEIYU CUI, JISHUN JIANG and SEGUNDO
TAMAY,

Plaintiffs,

Case no.: 2:11-CV-05243-SRC-MAS

-against-

YOU CHUN PALISADES CORPORATION
and NAM JE. PARK,

Defendants.

ANSWER

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Defendants, YOU CHUN PALISADES CORPORATION and NAM JE. PARK, by and through
their attorneys, LAW OFFICES OF PETER H. KIM, P.C., as and for their Answer to the Complaint,
says:

1. Admit.
2. Deny.
3. Deny.
4. Deny.
5. Deny.
6. Deny.
7. Admit
8. Admit
9. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the
allegations contained in this paragraph of the Complaint herein.
10. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the
allegations contained in this paragraph of the Complaint herein.
11. Admit.

12. Deny.

13. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

14. Deny.

15. Deny.

16. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

17. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

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23. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

24. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

25. Deny.

26. Deny.

27. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

28. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

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36. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

37. Deny.

38. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.
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45. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.
46. Deny.
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57. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.
58. Deny.
59. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.
60. Deny.
61. Defendant is not with sufficient knowledge or information to form a belief as to the truth of the allegations contained in this paragraph of the Complaint herein.

62. Defendant repeats and realleges each and every answer stated above as if though fully set forth at length herein

63. Deny.

64. Deny.

65. Defendant repeats and realleges each and every answer stated above as if though fully set forth at length herein

66. Deny.

67. Deny.

68. Defendant repeats and realleges each and every answer stated above as if though fully set forth at length herein

69. Deny.

70. Deny.

71. Defendant repeats and realleges each and every answer stated above as if though fully set forth at length herein.

72. Deny.

73. Deny.

74. Defendant repeats and realleges each and every answer stated above as if though fully set forth at length herein.

75. Deny.

76. Deny.

**AS AND FOR A FIRST SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

77. The Plaintiff's Complaint fails to set forth facts sufficient upon which to base a cause of action against the Defendant.

78. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

**AS AND FOR A SECOND SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

79. The Defendant was improperly served with process and as a result of the foregoing, this Court lacks In Persona Jurisdiction over the Defendant.

80. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

**AS AND FOR A THIRD SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

81. The Plaintiff is time bared by the applicable Statue of Limitation for such causes of actions that the Plaintiff if alleging.

82. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

**AS AND FOR A FOURTH SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

83. The Plaintiff's Complaint fails to set forth sufficient facts and basis of their claim and allocation of their monetary demand and/or fails to allocated prior payments and adjustments made by Defendant.

84. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

**AS AND FOR A FIFTH SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

85. The Defendant has paid all wages and overtime as agreed by the parties.

86. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

**AS AND FOR A SIXTH SEPARATE AND AFFIRMATIVE COMPLETE
AND/OR PARTIAL DEFENSE, THE DEFENDANTS ALLEGES:**

87. The Plaintiff's amounts demanded in the Complaint are improper and incorrect.

88. As a result, the Plaintiff's Complaint must be dismissed as a matter of law.

WHEREFORE, Defendant demand a judgment dismissing the Complaint together with attorney's fees, costs and such other and further relief as this Court deems just and proper.

Dated: October 19, 2011

LAW OFFICES OF PETER H. KIM PC



PETER H. KIM, ESQ. (PHK-5194)

Attorney for Defendants

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